



May 10, 2016

Reference No. 038443-12

Ms. Leslie Patterson
Remedial Project Manager
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Mail Code SR-6J
Chicago, Illinois
60604

Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
45268

Dear Ms. Patterson and Mr. Renninger:

**Re: Progress Report: April 1 through 30, 2016
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of April 1 through 30, 2016.

The next Progress Report for the month of May 2016 will be submitted on or before June 10, 2016.

Significant Developments in this Reporting Period

RI/FS ASAOC Developments

On April 14, 2016, a meeting was held to discuss the development of the RI/FS Work Plan pending finalization of the new ASAOC. The meeting participants included USEPA, Ohio EPA, CH2M Hill, Respondents Technical Committee and GHD.

On April 25, 2016, GHD provided the presentation slides from the April 14, 2016 meeting via a link through electronic mail to the meeting participants.

Removal Action ASAOC Developments

On April 4, 2016, GHD and Environmental Doctor began the SSDS modifications for Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending), and Building 15 (SIM

Trainer). Modifications were completed on April 13, 2016. GHD will complete the SSDS modification sampling and annual proficiency sampling in one single event in July 2016.

On April 13, 2016, GHD conducted SSDS confirmatory sampling at Buildings 8 and 9 (B&G Truck Equipment and Repair) to satisfy the requirement to collect samples 60 days after the SSDS modifications. Analytical results are due in May 2016.

On April 22, 2016, USEPA and the Respondents participated in a conference call regarding the status of the SSDS modifications.

During the April 22 conference call, the participants discussed the following topics:

- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending, formerly Bullseye Amusements), and Building 15 (SIM Trainer) began on April 4, 2016 and were completed on April 13, 2016.
- GHD summarized vacuum readings (i.e., measured prior to and following SSDS modifications). Vacuum readings measured following SSDS modifications showed an improvement over vacuum readings measured prior to SSDS modifications for all targeted probes. Further adjustment of valve settings will be considered to increase or reduce vacuum response within individual buildings as necessary.
- Sampling for Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending), and Building 15 (SIM Trainer) was originally proposed for 60 days following the SSDS modifications (i.e., June). USEPA consented to one single mobilization in July 2016. Therefore, GHD will complete the SSDS modification sampling and annual proficiency sampling in one joint event in July 2016. Further adjustment of valve settings will be conducted as appropriate prior to July.
- SSDS confirmatory sampling was conducted at Buildings 8 and 9 (B&G Equipment & Truck Repair) on April 13, 2016 to satisfy the requirement to collect samples 60 days after SSDS modifications. Analytical results are due on May 5, 2016. If sample results are favorable, USEPA will also consider this April sampling event as the annual proficiency sampling event for 2016, and the next sample event would occur in July 2017.
- Next conference call scheduled for May 19, 2016 at 2:30 PM ET.

The status for each building requiring mitigation, as of April 30, 2016, is summarized in Attachment A.

Summaries of all Anticipated Problems and Planned Resolutions

As previously discussed with USEPA, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation has had, and will have, on their business. The owners of the buildings (i.e., South Dayton Remediation Trust) refused to allow additional work to occur. On October 24, 2014, the Respondents transmitted letters to the owners and tenants of the buildings with remaining sub-slab issues providing the analytical results for sampling completed to date and seeking their consent to cease intrusive vapor abatement activities and transition to an enhanced indoor air monitoring program. In January 2015, the legal counsel for the owners provided written notification that the owners and tenants agree to

allow indoor air monitoring to proceed but were not willing to allow further remedial work. In September 2015, USEPA and GHD met with owners and tenants and informally discussed the potential for further remedial work. In December 2015 and January 2016, meetings were conducted with owner/tenants at all building locations with a SSDS to address further remedial work. Owners/tenants agree to allow further remedial work (i.e., mitigation system modifications).

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/36

Encl.

cc: (all by pdf)	Leslie Patterson, U.S. EPA	Madelyn Adams, Ohio EPA
	Wendell Barner, Barner Consulting	Steve Quigley, GHD
	Tim Hoffman, Dinsmore & Shohl	Brett Fishwild, CH2M Hill
	Robin Lunn, Neal, Gerber & Eisenberg	Ken Brown, ITW
	Bryan Heath, NCR	Jim Campbell, EMI
	Scott Blackhurst, Kelsey Hayes Company	Wray Blattner, Thompson Hine
	Valerie Chan, GHD	

Attachment A

Summary of Building Status

As of April 30, 2016, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- 2015 indoor air (IA) and/or SS soil vapor sampling were completed on February 17, 2015, July 15, 2015, and October 6, 2015:
 - Trichloroethene concentration in SS soil vapor samples collected from probes SS-8-A and SS-8-B were greater than ODH screening level (AF of 33). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
 - The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
 - The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
 - All fans were operational during the October 2015 sampling round.
- SSDS modifications including EP-3 and EP-5 stemline installations were completed on February 5, 2016.
- 60-day post-SSDS modification sampling was completed at Building 8 (B&G Equipment & Truck Repair) on April 13, 2016.¹ Analytical results are due in May 2016.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, 2015, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- SSDS modifications including EP-2 stemline installation and EP-3 installation were completed on February 5, 2016.

¹ If sample results are favorable, USEPA will also consider this April sampling event as the annual proficiency sampling event for 2016, and the next sample event would occur in July 2017

- 60-day post-SSDS modification sampling was completed at Building 9 (B&G Equipment & Truck Repair) on April 13, 2016.¹ Analytical results are due in May 2016.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA proposed SSDS modifications to the building owner and tenants during the January 28, 2016 meeting.
- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision) began on April 4, 2016 and were completed by April 13, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 14 (NexGen Vending):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, 2015 and July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- A proposed SSDS modification (addition of an extraction point) was agreed upon during the January 28, 2016 meeting.
- SSDS modifications at Building 14 (NexGen Vending) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 14, 2015.

- July 2015 TCE SS concentration at SS-15-C was greater than the ODH SS screening level (AF of 33).
- IA concentrations are less than ODH IA screening levels.
- Respondents and USEPA proposed SSDS modifications to the building owner during the January 28, 2016 meeting.
- SSDS modifications at Building 15 (SIM Trainer) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.
- Annual proficiency sampling was completed on February 10, 2016.
- The building is in compliance.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- Additional confirmatory sampling completed on July 16, 2015.
- SSDS modifications for Globe Equipment were completed on February 13, 2016.
- Annual proficiency sampling was completed on February 11, 2016.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels:
 - The sub-slab sample result for SS-24-B was greater than the ODH screening level (AF=10) but less than the secondary screening level (AF=33).